UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK ------------X

STEVEN JUDE,

Plaintiff.

17CV 0045

-against-

JURY TRAIL DEMANDED

RECEIVED SDNY PRO SE OFFICE 06

THE CITY OF NEW YORK, a municipal corp; DEPARTMENT OF CORRECTION,("DOC") A municipal corp;JOSEPH PONTE, commissioner of the City of New York Department of Correction, ("DOC"); HEALTH AND HOSPITAL CORP, ("HHC"): MAXSOLAINE MINGO, warden at ("AMKCK"); CAROLYN SANDERS, Warden at ("NIC"); FRANTZ CYRILLE, M.D.; JOSEPH McCREADY, PA; DR. JAY COWAN, regional Medical Coordinator; NINA EDWARDS, Disability Rights Coordinator,("DOCS"); HIRMA# 18522, Correction Officer; SHMOTOLOCHA, ("DOCS") invesigator; PEREZ #1846, Captain at ("AMKC"); LESSEY# 1359, Captain at ("AMKC"); any JOHN DOES or JANE DOES 1 thru 20 who may have information are sued in their individual and official capacities.

COMPLAINT

Defendants,

---X

I. Complaint

Plaintiff STEVEN JUDE, Pro-Se for his complaint states as follws:

II. Parties, Juridiction and Venue

1. Plaintiff STEVEN JUDE, was confined at the Anna M. Kross Center, (hereinafter referred to as ("AMKC") a municipal City jail located on Rikers Island, at 18-18 Hazen Street, East Elmhurst, NY 11370, in the City of New York.

2. Plaintiff STEVEN JUDE, is and was at all mentioned times herein an adult citizen of the United States as well as a resident of the State of New York.

3. Defendant CITY OF NEW YORK, was and still is a municipal Corp duly organized and existing under and by virtue of the Laws of the State of New York.

4. Defendant DEPARTMENT OF CORRECTION, (Hereinafter referred to as ("DOCS") was at all relevant times herein a duly authorized public authority and/or correction department, authorized to perform all functions of a correction department as per the applicable sections of the aforementioned municipal corporation CITY OF NEW YORK.

5. Defendant JOESPH PONTE, was at all relevant times herein the Commissioner of the New York City Department of Corrections for the CITY OF NEW YORK, with the responsibility for operating and maintaining detention, penal, and corrective instutions within the City of New York, including the Anna M. Kross Center, ("AMKC") and The North Infirmary Command., ("NIC")

6. HEALTH AND HOSPITAL CORP, ("HHC"), is and was at all relevant times herein engaged in providing medical services for the CITY OF NEW YORK, in the City's ("DOCS"), and the North Infiramry Command, ("NIC") and Anna M. Kross Center, ("AMKC") under a contract with the CITY OF NEW YORK, HEALTH HOSPTIAL CORP, ("HHC") acted in the capacity of agent, servant, and employee of the CITY OF NEW YORK, and is being sued in it's individual capacity.

7. Defendant MAXSOLAINE MINGO, is and was at all times relevant herein the warden of the municipal detention center known as the Anna M. Kross Center, ("AMKC") for the CITY OF NEW YORK, as warden of the prsion, defendant manages it's day-to-day operations and executes its policies.

8. Defendant CAROLYN SANDERS, is and was at all times relevant herein the warden of the municipal detention center known as the North Infirmary Command, ("NIC") for the CITY OF NEW YORK, as warden of the prsion, defendnat manages its day-to-day operations and executes its policies.

9. Defendant FRANZT CYRILLE, M.D., is and was at all relevant times herein an employee of the Health and hosptial sorp. with the responsibility as the Medical Doctor and acted as an agent of the Health and Hosptial Corp, Inc, and the CITY to provide medical services in the Citys detention facilities.

10. Defendant JOSEPH McCREADY, P.A., is and was at all relevant times herein an employee of the HEALTH AND HOSPITAL CORP, with the responsibility as a Physchain Assistant and acted as an agent of the HEALTH AND HOSPITAL CORP, and the CITY to provide medical services in the CITY"S detention facilities.

11. Defendant Dr. JAY COWAN, is and was at all relevant times herein an employee of the HEALTH AND HOSPITAL CORP, with the responsibility as the Regional Medical Coordinator and acted as an agent of HEALTH AND HOSPTIAL CORP, and the CITY to provide medical services in the CITY's detention facilities.

12. Defendant NINA EDWARDS, is and was at all times relevant herein the Disability Rights Coordinator allegedly of the municipal DEPARTMENT OF CORRECTIONS, ("DOCS"), designatedx with the responsibility to coordinate ("DOCS") efforts to comply with ("DOCS") obligations under the American with Disabilities Act, ("ADA"), with respect to ("DOCS") inmates in accordance with 28 C.F.R. 35.107.

13. HIRMA #18522, is and was at all times relevant herein a correction officer of the municipal ("DOCS") designated with the responsibility of care, custody and control of the inmates in ("DOCS") facilities in the CITY of New York.

14. Defendant SHMOTOLOCHA, is and was at all time relevant herein an investigator of the municipal ("DOCS") designated with the responsibli to investigate complaints made within the new York City Department of Corrections, for the CITY of New York.

15. Defendant PEREZ# 1846, is and was at all times relevant herein a correction Captain of the municipal ("DOCS"), designated with the responsibility of care, custody andcontrol and supervision of correction officers and housing units.

16. Defendant LESSEY# 1359, is and was at all times relevant herein a correction Captain of the municipal ("DOCS"), designated with the responsibility of care, custody and control, and supervision of correctio officers and housing units.

17. This action arise under and is brought pursuant to 42 U.S.C section 1983, 42 U.S.C. 12131, 28 C.F.R. 35.107 Title II of the American with Diabilities Act, section 504, and Rehabilitation Act of 1973 to remedy the deprivation under color ofo State law of right guaranteed by the Eighth, Sixth, Fourteenth Amendements to the United States Constitution and the Equal Protection law, and Negligence under State Law. This Court has jurisdiction over this action pusuant to 28 U.S.C. sections 1331 and 1343.

18. This Court has supplemental Jurisdiction over plaintiffs State law claims.

19. Plaintiff claims for injunctive relief are authorized by rule 65 of the Federal Rules of Civil Procedure.

20. This cause of action arose in the Southern District of New York Therefore venue is proper under 28 U.S.C. section 1391(b).

III. Statement of Claim

21. At all relevant times herein, defendants were "persons" for the purpose of 42 USC 1983, 42 USC 12131, Title II, Section 504 of the Disability Act and Rehabilitation Act of America and acted under color of law to deprive plaintiff of his constitutional rights as set forth more fully below.

IV. Statement of Facts

22. Historically the CITY and ("DOC"S), have showed deliberate inddiference and Negligence towards the disable inmates being confined in it's detention facilities, and have not followed mandate of the American with Disability Act, or Rehabilitation Act of 1973 WHEREAS, The United States of America had to bring a civil action against the New York City Department of Corrections, ("DOCS") to enforce a voluntary compliance of the public entity and several other class actions and individual lawsuits by disable inmates including plainitff which have been settled out over the years, See Bennett v. City, et, al. 07-cv-2823 (RPP) Settlement agreement, and previous Jude V. City.

23. On 11/30/16, Plaintiff was remanded from court into the custody of the CIty of New York DEPARTMENT OF CORRECTIONS, ("DOCS"), and was sent to Manhattan Detention Center, herein refeeed to as ("MDC"), where during admission plaintiff seen a P.A. JOSEPH MCCREADY, whom noted plaintiff was "legally Blind and had a drop foot, with a foot to ankle leg brace on to walk, this P.A. noted plaintiff had an eye disease of Glaucoma and ordered Timolo Maleate Ophthalmic soluation eye drops, which is issued to Glaucoma patients with vision loss, he also noted plaintiff was diabetic which causes vision loss as well.

24. P.A. McCready said he wanted to send plaintiff to disable hosuing after he noticed plaintiff had difficulty walking and seeing however said he didnt know whether beds were available, but never attempted to call ("NIC") to see if beds were open in the diable housing facility, and although plaintiff requested disable housing plaintiff was sent to general population and not disable housing

25. Plaintiff although clearly disabled was sent to 5 East at the Manhattan Detention Facility, ("MDC") and placed in a Maxium Security Risk Group,("SRG") housing unit amongst members of the Ape Blood set which took advantage of all non-gang members who wasn't Ape.

26. Plaintiff stayed housed there approx a week before subsequently being transferred to Rikers Island Anna M. Kross center which usually intake Herion Addicts, at ("AMKC") the intake officer never classified plaintiff or asked him whether he had any gang affilations, and housed him in 8-Upper, a Mack Baller Blood Set housing area which was another Security Risk Group, (SRG) housing unit, although plaintiff clearly had a disability he was housed in an upstairs housing unit amongst some of the most violent Blood gang members who mistreated all non, Mack Baller individuals and had seperations from other Known gang sets on Rikers Island, they are so prospone to violence they couldnt be housed with other Blood Sets, and had to be housed by themseleves.

27. Plaintiff was robbed of his personal affects and commissary after gang members put an ice-pick in his ear and threaten to push it through if he did not give up his possesssions, whereupon him and (4) other non gang members was robbed of there commissary, sneakers in 8-Upper, these specific Mack Baller Brim Set of Bloods are known for their prosenity for violence and told the correction officers what to do when they was going to lock in and attacked other non gang members with a scaple and ice-pick stabbed and cut these inmates up whom both came from ("MDC) with plaintiff and told the correction officers to pick somebody else which was a non gang member to take the weight for it not to write them a infraction and the correction officer never wrote any of them infractions, there was no camerasin this area although it was housed with Security Risk Group, (SRG), whom are known to be the most violent.

28. Plaintiff housing unit dont' get law library or sick call daily cause they had so many seperations from other blood set members and it subjected him to be denied services many of times, due to there being no cameras in the hosuing unit and stabbings and cuttings happened which nobody was ever blamed for, the facility decided to shut the housing unit down and move plaintiff whole housing unit to 12 lower, where they had already installed cameras, to a brand new housing area.

29. prior to plaintiff moving from 8-upper to 12 lower he signed sick call on 12/12/16 and seen a Medical Doctor Frantz Cyrille, whom noted plaintiff was "legally Blind" had a leg brace and difficulty in walking, defendant Stated that he would house plaintiff in disable housing, however tried to call and allegedly no beds were available at ("NIC") which was a fabrication from the P.A. at ("NIC), defendant issued plaintiff a cane and said he'll have plaintiff moved to a housing unit closer to the clinic , because the distance from 8-upper to the clinic was approx (5) city blocks, and plaintiff had to walk up stairs to get to his housing unit.

30. Plaintiff was issued a cane and sent back to his housing unit of 8 =upper and told to report back in three days to see if any beds would be available in the disable hosuing unit.

31. Plaintiff never was transferred to another housing unit like he was told but instead left in 8-upper but was issued a cane and a note stating plaintiff could utilize the cane for (1) month.

32. Plaintiffs entire hosuing unit moved from 8-upper to 12 lower to a area that had camera, he remained in the Mack Baller Blood set house and on 12/19/16, a correction officer Flood came to pick plaintiff up for his diabetic Blood sugar test around 7;45, when they arrived in the main corridor metal detector by the visiting room an Officer Hiram #18522, whom had previously harassed plaintiff about his leg-brace cause he set off the metal detector with the metal on his brace ordered plaintiff while cursing to "Takek that fucking brace off and hop through the metal detector, after telling officer Hirma I couldnt walk without the brace, I asked to sit down on the chair, he told me to sit on the floor, officer Hirma and me started arguing after he refused to utilize the hand held metal detector or pat frisk me, came up to me and struck me in the face, whereupon two officers Flood and another unknown officer had to seperate us all while a captain looked on and instructed another officer to serach me cause officer Hirma actions and was clearly pissed off at Officer Hirma actions.

33. This altercation between plaintiff and officer Hirma#18522 took place on camera in the main corridor while an supervisor looked on no body wrote any reports or did they provide plainitff with medical attention, plaintiff went to the clinic took his blood sugar test and upon returning officer Hirma tried to attack plaintiff again whereas two officers and another Captain coming out of the M.O. area had to restrain him cause he attempted to attack plaintiff a disabled inmate because he had a leg brace, and set off the metal detector, Officer Hirma attempted to spit on plaintiff this time after him and plaintiff had a verbal confrontation Officer Hirma said plaintiff"Dead mother could suck dick" while being restrained in the ha;llway by officer Flood and Captain with no reports ordered.

34. Plaintiff called 311 and made complaints to the CITY about what transpired in the Hallway, and was provied with the following confirmation numbers from all his complaints about the assualt and him having his life placed in danger in gang member ("SRG") housing units# c-1-1-113412684, in some of the complaints he complained about being diabled in a Blood, ("SRG") housing area C-1-1345921797, C-1-11345448029, # C-1-1345082351, # C-1-1134512684, #C-1-11346561255 which are all 311 confirmation numbers of the complaint made to the City of New York about plaintiffs situation,

35. On 12-20-16 Plaintiff seen the area supervisor Captain Lessey #1359 told him what occured after coming from court and requested that he provide me with medical attention from the assault, defendant Lessey told plaintiff thats someone elses problem not his bag, that plaintiff should call 311 and complain to them they'll get him medical assistance that was someones job.

36. Later that night plaintiff refused to locked in until he got medical attention cause they refused to come get plainitff and other inmates sick call, a Captain Perez responded to the area with a probe team with a camera whom sheild # was 1846, Defendant Perez had officers escort three inmates to the clinic for sick call at 9:PM and handcuffed plaintiff on camera and took him to intake plaintiff refused to wALK so a streatcher was summoned for him and he was rolled on camera to intake and denied medical attention, defendant perez did not notify the intake captain why plaintiff was brought down, plaintiff seen the intake captain and explained why he was there, which he said nobody even told him, an hour after being in intake he ordered plaintiff be taaken back to his housing unit by an officer Stevens, and said that he wasnt being stuck with somebodys elses baggage.

37. On 12-21-16, plaintiff refused to lock in and was chased through the gates after being jumped and beaten by Mack Baller gang members from the bloods, plaintiff was rehoused and placed in Quad 2-lower another security Risk Group, ("SRG") which houses only Crip gang members, at first the Crips denied plaintiff entry into the housing but after plaintiff pleading with Crip Gang members that he just wanted a place to sleep and had a problem with the rival Blood gang members they allowed plaitiff to enter and remain there.

38. After plaintiff was jumped and chased out of 12-lower by the Bloods Mack Baller Brim set instead of him being taken to medical he was re-housed in 2-lower amonhgst the crips.

39. On 12-22-16 an investigator came to see plaintiff along with (4) other invesigators, plaintiffs Statement was taken but nothing more and picture was taken, plaintiff expalined in detail what happened who was there and explained that it was on video, and he still didnt get any medical attention.

40. On 12-23-16 A Doctor Ali called plaintiff with an injury report about plaintiff being punched in the mouth and noted his injuries and medical complaint, however she did not elaborate on how he may have maintain this injury, no statements was provided for plaintiff to fill out which is done in an investigation.

41. The Crips Gang members aren't violent and do not bother other non-gang members such as plaintiff and others.

42. On 12-23-16 Doctor Ali seen plaintiff about his reasonable accommodations request complaint, examined plaintiff and noted his medical condition of being "legally Blind" and having a Drop Foot with a Foot to ankle to knee leg-brace, called ("NIC") and was told by a Doctor at ("NIC") that no beds were available, Doctor Ali told plaintiff that this particular Doctor doesnt like to except new peopl at ("NIC") for plaintifff to remain quiet while she talked, after being told it was no beds, Dr. Ali said plaintiff should of been sent directly to ("NIC") upon admission by Defendant JOSEPH MCCREADY.

43. The employees from the DEFENDANTS Health and Hospital Corp working for defendant CITY is the same ones that CORIZON health, INC emploed, and which failed the inmates within correctional facilites, and was so bad that the contract with Corizon Health, inc, was not renewed however the same servants, agents, affiliated physycyans, assistants, resdients, interns aides, employees and/or medical peronnel, the personell is the same that failed the disabled inmates in ("DOC"S) care, custody and control trhouhout the years.

44. In general the HEALTH AND HOSPITAL CORP, their servants, agents affiliated physicians, assistants, residents interns aides, employees/ and or medical personnell showed negligence and deliberate indifference to the reasonable accommodations and medical needs of disabled prisoners being held in it's custody and particualry those of the plaintiff herein in this action.

45. The HEALTH AND HOSPITAL CORP, ARE knowingly and intentionally denying inmates bed-speace at ("NIC") by telling the doctor or P.A. calling that there is no bed-space available this has happened to plaintiff as well as other disabled inmates atleast (4) other times causing plaintiff to be housed in general population, when plaintiff usually gets to ("NIC") there is always atleast (20) extrat beds alway alvailable, the disable unit can hold as many as (70) beds and is and have always been far under capacity.

46. The HEALTH AND HOSPTIAL Instead of sending plaintiff directly to disable housing unit subjected plaintiff to suffer unnecesary and wanton infliction of pain, subjected to discrimination and Humiliation, by not affording him reasonable accommodations, subjected plaintiff to cruel and unusal punishment, and violated his disability right and rehabilitation rights, and along with the Defendants CITY and ("DOC") violated his constutional rights, plaintiff is and has been unable to shower cause he needs a shower chair cause he can't stand up in the shower.

Claims for Relief

47. That by reason of the foregoing, the plaintiff STEVEN JUDE, was severly injured, and damaged, rendered sick, sore lame and has been discriminated against as a disabled individual, sustained severe shock and mental anguish, unnecessary and wanton pain and emotional upset, some of which injuries are permanent in nature and duration, and plaintiff will be permanently caused to suffer pain, inconveience and other effects of such injuries, plaintiff incerred and/or in the future will necessarily incur future hospital and/or medical expenses in an effort to be cured of said inuries, and plaintiff has suffered violations of his rights under the American with Disabilities Act, Title II of the ADA sections 504, plaintiff will be unable to pursue the usual duties with the same degree of efficiency as prior to the deliberate indifference and negligence, discrimination, and malpractice of the CITY, DEPARTMENT OF CORRECTIONS and HEALTH AND HOSPITAL CORP, all to plaintiffs great damage.

Relief requested

WHEREFORE, plaintiff request that this court grant the follwing releif:

48. Plaintiff request an order declaring that the defendants have acted in violation of the Amewrican with Disabilites Act, Title II, section 504, violated prior settlement agreements and mandates of the law and the United States Constution and State laws.

49. Plaintiff seeks to go to trail.

Signed this 23rd day of December

I declare under the penalty of perjury that he foregoing is true and correct.

NEW YORK STATE | Commission for the Blind

ANDREW M. CUOMO
Governor

SHEILA J. POOLE
Acting Commissioner

Verification of Legal Blindness

NYSCB Registration No.
CF# 162955

Name:
STEVEN JUDE #72469-054
Address: M.C.C. 150 Park Row New York, NY 10007

The above named person is registered as legally blind with the Commission for the Blind in accordance with New York State law, Section 8704.

Signature:	Roger T. Gray
Title:	Director, Program Evaluation and Support
Date:	08/19/2015

Opt 4·2012

LIGHTHOUSE
INTERNATIONAL

New York Lighthouse
Vision Rehabilitation Service

August 20, 2008

Re: Steven Jude 10A4771
DOB: 03/22/1970

To Whom It May Concern,

Please be advised that Mr. Steven Jude is a patient of Lighthouse International. At his last visit on 08/20/08, best corrected VA was found to be 1 foot/300 (20/6000) OD, and HM OS, thereby rendering Mr. Jude Legally Blind from Glaucoma OD, OS. Due to his extremely impaired vision, climbing steps, seeing traffic lights, crossing streets, seeing street signs and reading are all extremely difficult tasks. Mr. Jude is at great risk for injury should he need to use mass transit without the assistance of a sighted guide. Please assist this nice gentleman in any way possible. If you have any questions, please feel free to contact me.

Sincerely,

Andrea Zimmerman

Andrea Zimmerman, OD FAAO
Lighthouse International Low Vision Clinician

111 East 59th Street New York, NY 10022-1202
Tel: (212) 821-9200 Fax: (212) 821-9707 TTY: (212) 821-9713 www.lighthouse.org

Wilker, Dale

From: Wilker, Dale
Sent: Monday, June 08, 2015 1:07 PM
To: Jay Cowan (Jay.Cowan@Corizonnyc.com); Dr. Homer Venters; Erik.Berliner@doc.nyc.gov
Cc: Nina.Edwards@doc.nyc.gov; 'CONSTITUENT SERVICES'; Heidi Grossman, Esq; Laura Mello, Esq; Nadene Pinnock, Esq; Alixzondra Jasmin, RN; Athanasia Toumanidis; Dr. Anthony Waters; Dr. Luis Cintron; Dr. R. Macdonald; Dr. Zachary Rosner; Eric Zimiles; George Axelrod; Nancy Arias RN; Patricia Morgese; Pinney, Becky; Amy-Monique Waddell (AWaddell@boc.nyc.gov); Ashley D'Inverno; Chai Park; Felix Martinez (fmartinez@boc.nyc.gov); Richard T. Wolf (rtwolf@boc.nyc.gov); Tonya (BOC) Glover
Subject: TRANSFER REQUEST TO NIC DISABILITY UNIT: Steven Jude 349-15-04029 AMKC

THE LEGAL AID SOCIETY

Mr. Jude is legally blind. He reports that he has been denied admission to the NIC Disability Unit because it is too full. However, that unit can hold as many as 70 beds and has on all of our visits been far under capacity.

He says that he remains at AMKC despite having a document from the DOC Disability Coordinator, Nina Edwards, stating to the AMKC administration that he is to be housed at NIC.

In the meantime, he says that he fell down stairs at AMKC due to his poor eyesight and lack of a guide to assist him to get around safely.

Would you please intervene to transfer Mr. Jude to NIC today?

ADA
In accordance with the Americans With Disabilities Act, DOC Directive 3802 on Reasonable Accommodations, and DOH policy and procedures, please consider this email as a formal request for reasonable accommodation of his disability and needs.

Thank you for your attention to this matter.

Dale A. Wilker

Staff Attorney
The Legal Aid Society
Civil Practice / Prisoners' Rights Project
199 Water Street, Room 3059
New York, New York 10038
tel: 212-577-3530 ext. 3943
fax: 212-509-8433
email: dwilker@legal-aid.org

HEALTH+ HOSPITALS

REFERRAL

Consultation Request and Hospital Transfer Form

Referral To Information:

Specialty: Miscellaneous
Provider Name: Internal (REF) DOC
Facility: Anna M. Kross Correctional Facility

Patient Information:

Patient: STEAVEN JUDE
DOB: 03/22/1970
BookCase: 3101601111
NYSID: 05595310P
Facility: Anna M. Kross Correctional Facility
Housing Area: QUAD-U8
MRN No:

Referral From Information:

Referral ID: 00001302215
Provider Name: Frantz Cyrille, MD
Date and Time: 12/12/2016
Priority: Routine
Diagnosis: 719.7 - Difficulty in walking
Reason: Difficult in walking ,allow pt to use cane for 1 m
Notes: Cyrille,Frantz , MD 12/12/2016 6:29:16 PM > Difficult in walking ,allow pt to use cane for 1 month

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Consulting Physician Information:

Date of Service:__________________

Physician(Print Name): __________________ Physician Signature: _______________

Please place findings and recommendations below (use additional paper if necessary):

NYC HEALTH + HOSPITALS

REFERRAL

Consultation Request and Hospital Transfer Form

Referral To Information:

Specialty: Miscellaneous
Provider Name: Manhattan Detention Complex MDC
Facility: Manhattan Detention Center

Patient Information:

Patient: STEAVEN JUDE
DOB: 03/22/1970
BookCase: 3101601111
NYSID: 05595310P
Facility: Manhattan Detention Center
Housing Area: RR
MRN No:

Referral From Information:

Referral ID: 00001296759
Provider Name: Joseph Mccready, PA
Date and Time: 11/30/2016
Priority: Routine
Diagnosis: 756.9 - MUSCULOSKEL ANOM NEC/NOS
Reason: needs special orthopedic footwear---wears footdrop apparatus lt lower leg
Notes: Mccready,Joseph , PA 11/30/2016 10:46:47 PM > needs special orthopedic footwear---wears footdrop apparatus lt lower leg

Consulting Physician Information:

Date of Service: 11/30/16

Physician(Print Name): [illegible] Physician Signature: Joseph McCready, RPA

Please place findings and recommendations below (use additional paper if necessary):

Attachment B

Form: #7101R, Eff.: 09/10/12, Ref.: Dir. #3376 - page 1

City of New York - Department of Correction

INMATE GRIEVANCE AND REQUEST PROGRAM STATEMENT FORM

Inmate's Name:	Book & Case #:	NYSID # (optional):	
S. Jude (Steaven)	310-15-01111	05595310-P	
Facility:	**Housing Area:**	**Date of Incident:**	**Date Submitted:**
A.M.K.C.	9 Upper	12-6-15	12-7-15

All grievances and requests must be submitted within ten business days after the incident occurred, unless the condition or issue is on-going. The inmate filing the grievance or request must personally prepare this statement. Upon collection by Inmate Grievance and Request Program (IGRP) staff, IGRP staff will time-stamp and issue it a grievance/request reference number. IGRP staff shall provide the inmate with a copy of this form as a record of receipt within two business days of receiving it.

Request or Grievance:

I am a legally blind inmate whom is requesting that DOC provide mm me with reaswonable accommodation under the disability Act ADA , Iam legally blind plus I have a drop foot, Medical Tried to send me to disabled housing however their claiming that they do not have any available beds, when there is always available beds at NIC.. I might be inured and am entitled to be housed in NIC disable hopusing as always..Im having a hard time functioning in general population

Action Requested by Inmate

to be placed in disabled hosuing there is beds available this amounts to discrimination

Please read below and check the correct box:

Do you agree to have your statement edited for clarification by IGRP staff?	☐ Yes	☒ No
Do you need the IGRP staff to write the grievance or request for you?	☐ Yes	☐ No
Have you filed this grievance or request with a court or other agency?	☐ Yes	☐ No
Did you require the assistance of an interpreter?	☐ Yes	☐ No

Inmate's Signature: [signature] Date of Signature: 12-6-16

For DOC Office Use Only
IGRP RETAINS THE DOUBLE-SIDED ORIGINAL FOR ADMINISTRATIVE RECORDS.
IGRP MUST PROVIDE A COPY OF THIS FORM TO THE INMATE AS A RECORD OF RECEIPT.

Time Stamp Below:	Grievance and Request Reference #:	Category:
	NG	Request for Accom. 4 13
	Inmate Grievance and Request Program Staff's Signature: [signature] #21850	

CITY OF NEW YORK - DEPARTMENT OF CORRECTION

INMATE GRIEVANCE AND REQUEST PROGRAM

DISPOSITION FORM Attachment - C

Form: # 7102R
Eff.: 09/12/12
Ref.: Dir. #3376

Grievance/Request Reference #3101601111 N/G(request for Acc'd)Jude,Steaven

Date Filed 12/12/16

Facility AMKC QBU

Title of Grievance or Request: Request for Acc'D

Category: #13

From IGRP Inmate Statement Form, print or type short description of request/grievance: GrievaNT alleges he is not receivinbg reasonable accommodation from NYCD.

Action Requested by Inmate: To be placed in disabled housing.

STEP 1: INFORMAL RESOLUTION

Check one box: ☒ Grievance ☐ Request ☒ Submission not subject to the IGRP process.

The Inmate Grievance and Request Program proposes to informally resolve your grievance or request as follows below. Alternatively, IGRP staff shall provide an explanation for why the submission is not subject to the IGRP process.

on 12/15/16, the Director of NYCD's American's with Disabilities Act stated the matter has been addressed.

A/R=Accepted.

Are you satisfied with the proposed resolution?

☐ Yes, I accept the resolution. ☒ No

I request a formal hearing of the Inmate Grievance Resolution Committee within 5 business days from notification of the proposed resolution. I understand that if my submission involves a request to exercise religious beliefs or practices not currently available, then the Committee on Religious Accommodation will review my request.

Inmate's Signature:	Date: 12/22/16	Grievance Supervisor's Signature:	Date: 12-15-16

Steven Jude #31[illegible]
A M K.C.
18-18 Hazen st.
E. Elmhurst, NY 11370

RECEIVED
SDNY PRO SE OFFICE
2017 JAN -4 AM 11:06
S.D. OF N.Y.

UNITED STATES POSTAGE
PITNEY BOWES
02 1P $ 003.46⁰
0001810944 DEC 15 2016
MAILED FROM ZIP CODE 10017

USMP3
SDNY

Pro-se office
United States District Court
Southern District of New York
500 Pearl street
New York, N.Y. 10007

LEGAL MAIL